

**AIR POLLUTION CONTROL DISTRICT  
COUNTY OF SAN DIEGO**

**PROPOSED AMENDMED RULE 67.11 – WOOD PRODUCTS COATING  
OPERATIONS, AND THE REPEAL OF RULE 67.11.1 – LARGE  
COATING OPERATIONS FOR WOOD PRODUCTS**

**WORKSHOP REPORT**

A workshop notice was mailed to all companies and government agencies in San Diego County that may be subject to proposed amended Rule 67.11 – Wood Products Coating Operations. Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

The workshop was held on March 30, 2011, and was attended by 11 people. Written comments were also received before and after the workshop. The workshop comments and Air Pollution Control District (District) responses are as follows:

**1. WORKSHOP COMMENT**

The District should consider amending the definition of “Conversion Varnish” in Subsection (c) (8) to include the topcoat, as well as the accompanying sealer. To ensure optimum adhesion and coating performance, the conversion varnish wood coating finishing system requires a two coating system, the catalyzed sealer and catalyzed topcoat.

**DISTRICT RESPONSE**

The District agrees. The definition of “Conversion Varnish” has been amended to include the conversion varnish sealer that is applied as part of the conversion varnish wood coating finishing system.

**2. WORKSHOP COMMENT**

Vinyl sealers impart moisture resistance to finish systems and are frequently used as sealers. They will not be able to comply with the lower VOC content limit of 275 g/L in proposed amended Rule 67.11. The District should add an additional coating category for “Vinyl Sealers”, with a VOC content limit of 550 g/L.

**DISTRICT RESPONSE**

The District recognizes that a higher VOC content vinyl sealer or other coating may be needed in some instances to achieve a desired finish. Therefore, an exemption has been added to the proposed amended rule to allow any wood coating operation to use not more than 20 gallons of

non-compliant coatings per consecutive 12-months, provided that the total amount of non-compliant coatings used at a stationary source does not exceed 20 gallons per consecutive 12-months.

**3. WORKSHOP COMMENT**

When a coating is used outside of its intended category, what VOC content limit should that coating follow?

**DISTRICT RESPONSE**

A coating being used outside of the manufacturers' specification will be evaluated by the function it is expected to accomplish. For example, a coating being used as a sealer must comply with the 275 g/L VOC content limit for sealers.

**4. WORKSHOP COMMENT**

The District should not reduce the VOC content limit from 700 g/L to 480 g/L for low-solids stains, toners or washcoats that are being applied to refinished wood products.

**DISTRICT RESPONSE**

The District agrees. There are 9 facilities that are refinishing wood products with a total usage of approximately 800 gallons of all coatings per year. The estimated annual emissions from all wood coating refinishing facilities subject to Rule 67.11 in San Diego County are 0.75 tons per year. Therefore, the actual emission reductions achieved by lowering the VOC content limit for low-solids stains, toners or washcoats from 700 g/L to 480 g/L would be negligible.

**5. WRITTEN COMMENT**

Proposed amended Rule 67.11, Subsection (b)(1)(i), exempts coatings applied using a non-refillable aerosol spray container from complying with the provisions of Section (d). Does this exemption also apply to solvent cleaners applied using a non-refillable handheld aerosol spray container?

**DISTRICT RESPONSE**

No. Subsection (b)(1)(i) only exempts coatings applied from a non-refillable handheld aerosol spray container. All solvent cleaners must comply with the VOC content limit requirement of 25 g/L of material specified in Subsection (d)(4).

**6. WRITTEN COMMENT**

Are dimethyl carbonate and propylene carbonate exempt in San Diego County?

**DISTRICT RESPONSE**

Yes. Dimethyl carbonate and propylene carbonate are exempt compounds and can be found listed in Table 1 (Exempt Compounds) of District Rule 2.

**7. WRITTEN COMMENT**

Would airless and air assisted airless spray guns meet the coating application equipment standard?

**DISTRICT RESPONSE**

No. Airless and air assisted airless spray guns have a lower transfer efficiency than the other application methods identified in Subsection (d)(1) of proposed amended Rule 67.11. The transfer efficiency of coating application equipment must be at least equal to that of one of the application methods identified in Subsection (d)(1).

**8. WRITTEN COMMENT**

The District should include a category for “Pigmented Conversion Varnish” with a VOC content limit of 550 g/L.

**DISTRICT RESPONSE**

The District disagrees. Including a separate category for pigmented conversion varnish is not necessary. The current definition of “Conversion Varnishes” is broadly defined to encompass pigmented conversion varnish sealers and topcoats.

**9. WRITTEN COMMENT**

Why are conversion varnishes not listed in the VOC content limits for refinished wood products?

**DISTRICT RESPONSE**

Prior to the 1997 Rule 67.11 revision, conversion varnishes were considered topcoats with a VOC content limit of 680 g/L. In the 1997 rule revision, a separate new “Conversion Varnishes” category was added for coatings used for New Wood Products, with a more stringent VOC content limit of 550 g/L. The definition of topcoat was amended to exclude conversion

varnishes. Because a conversion varnish was no longer considered a topcoat, conversion varnishes applied to refinished wood products would have to comply with the “Any Other Coatings” category at 420 g/L. That was not the District’s intent; therefore, a “Conversion Varnishes” category has been added for Refinished Wood Products with a VOC content limit of 550 g/L.

**10. ARB COMMENT**

The District should revise Subsection (d)(3), VOC Limits for Refinished Wood Products. The VOC content limit for the “Multi-Colored Coating” category should be lowered from 685 g/L down to 680 g/L, to be consistent with other air districts in California.

**DISTRICT RESPONSE**

The District agrees. The proposed amended rule has been revised as suggested.

**11. ARB COMMENT**

The District should revise Subsection (d)(3), VOC Limits for Refinished Wood Products. The VOC content limit for the “Low-Solids Stains, Toners, or Washcoats” category should be lowered from 700 g/L down to 480 g/L, to be consistent with other air districts in California.

**DISTRICT RESPONSE**

The District disagrees. Please see District Response to Comment 4 above.

**12. EPA COMMENT**

The District should consider revising Subsection (c)(13), “Flow Coat”, by adding “and allow excess to drain off” after “object.”

**DISTRICT RESPONSE**

The District agrees. The proposed amended rule has been revised as suggested.

**13. EPA COMMENT**

The District should consider revising Subsection (c)(14), “Hand Application Method”, to include other methods that may be used but not listed in the definition.

**DISTRICT RESPONSE**

The District agrees. The proposed amended rule has been revised as suggested.

**14. EPA COMMENT**

The District should delete Subsection (c)(19), the definition of “Low-Solids Stain.” Instead, refer to Rule 2 to be consistent with other definitions defined in this manner.

**DISTRICT RESPONSE**

The District disagrees. The definition of “low-solids stain” clarifies a coating category contained in the rule and used in wood coating operations. This definition should remain readily accessible to facilities.

**15. EPA COMMENT**

The District should consider revising Subsection (c)(23), the definition of “Pigmented Coating”, by adding that pigmented coatings may be used either as an undercoat or topcoat.

**DISTRICT RESPONSE**

The District agrees. The proposed amended rule has been revised as suggested.

**16. EPA COMMENT**

The District should revise Subsection (c)(25), the definition of “Roll Coat”, by adding language that describes a method of “moving a substrate underneath a roller applicator”.

**DISTRICT RESPONSE**

The District disagrees. The current definition of “Roll Coat” adequately describes the roller coat method used.

**17. EPA COMMENT**

The District should consider revising Subsection (c)(28), the definition of “Stripping Material”, by adding “inks and adhesives”.

**DISTRICT RESPONSE**

The proposed rule has been revised by adding “adhesives” to the definition of “Stripping Materials”. However, “inks” are already included in the definition of “Coating”, Subsection (c)(6).

**18. EPA COMMENT**

The District should delete Subsection (c)(30), the definition of “Touch-up Operation.” Instead, refer to Rule 2 to be consistent with other definitions defined in this manner.

**DISTRICT RESPONSE**

The District disagrees. The definition of “Touch-up Operation” clarifies a type of coating operation that is currently used by facilities. The definition should remain readily accessible to facilities.

**19. EPA COMMENT**

The District should delete Subsection (c)(34), the definition of “VOC Content per Volume of Material.” Instead, refer to Rule 2 to be consistent with other definitions defined in this manner.

**DISTRICT RESPONSE**

The District disagrees. This definition was included to clarify that the VOC content of low-solids coatings, cleaning and stripping materials should be calculated per unit of volume of material, unlike the VOC content of high solid coatings.

**20. EPA COMMENT**

In Subsection (d)(1)(vii), alternate coating application methods should be approved by the APCO and the EPA.

**DISTRICT RESPONSE**

The District disagrees. The current language is consistent with other District rules, as well as with requirements of other California air districts.

**21. EPA COMMENT**

The heading for Subsection (d)(2) should read, "VOC Limits for Coating for New Wood Products", and for Subsection (d)(3) should read, "VOC Limits for Coating for Refinished Wood Products" to further clarify the subject of the two tables.

**DISTRICT RESPONSE**

The District has added language to clarify the headings of both subsections.

**22. EPA COMMENT**

The District should lower the VOC content limits in Subsection (d)(2)(i) for "High-Solids Stains" from 350 g/L to 240 g/L, to be consistent with SJVAPCD Rule 4606.

**DISTRICT RESPONSE**

The District disagrees. The proposed VOC content limit for "High-Solids Stains" at 350 g/L is consistent with the majority of California air districts, including SCAQMD Rule 1136. High-Solids Stains meeting the 350 g/L limit are readily available in Southern California.

**23. EPA COMMENT**

The District should lower the VOC content limits in Subsection (d)(2)(i) for "Inks" from 500 g/L to 250 g/L, to be consistent with BAAQMD flat wood coating rule, Rule 8-23.

**DISTRICT RESPONSE**

The District disagrees. The District's 500 g/L VOC content limit for "Inks" is consistent with the requirements found in the majority of California air districts' wood coating rules. Furthermore, the District does not have flat wood coating operations; therefore, the recommended limit does not apply.

**24. EPA COMMENT**

The District should lower the VOC content limits in Subsection (d)(3)(ii) for Refinished Wood Products for "Low-Solids Stains, Toners or Washcoats" from 700 g/L to 480 g/L, to be consistent with SMAQMD Rule 463.

**DISTRICT RESPONSE**

The District disagrees. Please see District Response to Comment 4 above.

## **25. EPA COMMENT**

The requirement in Subsection (f)(1)(iii) to, "Maintain monthly or daily records...", is vague and may undermine compliance. We suggest that daily recordkeeping be required if monthly VOC content limits exceed those in Subsections (d)(2), (3), (4), (5) and (6), such as required in SMAQMD Rule 463, Section 501.2. This is stated in Subsection (f)(2)(ii), but this applies only to situations using control equipment. In addition, EPA's Little Blue Book (August 21, 2001, page 11) recommends that rules which allow recordkeeping less frequently than daily should specify that the violations of the weekly requirement are presumed to be separate violations for each day within the week.

### **DISTRICT RESPONSE**

The District disagrees. The current language in Rule 67.11, Subsection (f)(1)(iii), is consistent with language in other SDAPCD rules, including those rules that were recently adopted into the California State Implementation Plan. Furthermore, the proposal is consistent with EPA's Little Blue Book (August 21, 2001, page 11, #4), which states that Rules that establish VOC content limits on materials (e.g., coating), but do not establish emission or use caps, can allow monthly recordkeeping for sources using only compliant materials. In addition, a facility's permit to operate will often require daily record keeping if the facility is subject to New Source Review.

## **26. EPA COMMENT**

All references to EPA test methods in Subsections (g)(1), (2) and (8) should have the complete title and the most recent date as listed in <http://www.epa.gov/ttn/emc/promgate.html>.

### **DISTRICT RESPONSE**

The District agrees. The proposed amended rule has been revised as suggested.

## **27. EPA COMMENT**

Regarding Subsections (g)(1), (2), (4), (6) and (8), other district test methods and guidelines should have the date of the EPA-approved version, which is not the date it was "approved by the EPA". The statement "approved by the EPA" should be removed. Refer to [http://www.arb.ca.gov/fcaa/tv/tvinfo/accp\\_mth.htm](http://www.arb.ca.gov/fcaa/tv/tvinfo/accp_mth.htm) for these approved version dates. In Subsection (g) (8) the guideline referenced should be SCAQMD CE - Guideline for Determination of VOC Capture Efficiency, dated May, 1995.



**DISTRICT RESPONSE**

The District agrees. The proposed amended rule has been revised as suggested.

**28. EPA COMMENT**

All ASTM test methods listed in Subsections (g)(3) and (7) should have the complete title and the EPA-approved version date, as listed in 40 CFR 60.1, not "or its most current version." The most recent version year, shown in parenthesis, should be removed. The correct approved ASTM test procedures are: D5403-93, D3792-91, D4017-96a and D4457-91.

**DISTRICT RESPONSE**

The District disagrees. The current ASTM test method references in proposed amended Rule 67.11, Section (g), are consistent with language in other District rules, including those rules that were recently adopted into the California State Implementation Plan. Furthermore, coating Manufacturer's and Testing Laboratories that perform ASTM test methods will only use the most current ASTM test method. The District does not want to reference a specific EPA approval date and have the rule be outdated once the EPA approval date changes.

**29. EPA COMMENT**

In Subsection (g)(7), the correct title for the EPA-approved district procedure is SD 1, Procedures for Estimating the Vapor Pressure of VOC Mixtures, dated June 20, 1990.

**DISTRICT RESPONSE**

The District agrees. The proposed amended rule has been revised as suggested.

AD:jl  
08/01/11